

EXHIBIT D

SINO STAR’S INFRINGEMENT ANALYSIS

U.S. Patent No. 7,009,596 – Onyx International Inc.

Claim 1

Sino Star Global Ltd. (“Sino Star”) provides evidence of infringement of claim 1 of U.S. Patent No. 7,009,596 (hereinafter “the ’596 patent”) by Onyx International Inc. (“Onyx”). In support thereof, Sino Star provides the following claim charts.

“Accused Instrumentalities” as used herein refers to electronic devices for reading information with a book interface (e.g. e-readers, tablets) including at least the Onyx BOOX Max Lumi. These claim charts demonstrate Onyx’s infringement by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from publicly available resources regarding the Accused Instrumentalities, as Onyx has not yet provided any non-public information. Accordingly, Sino Star reserves the right to supplement this infringement analysis once such information is made available to Sino Star. Furthermore, Sino Star reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

Unless otherwise noted, Sino Star contends that Onyx directly infringes the ’596 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, and/or importing the Accused Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, Sino Star further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. §§ 271(b) and/or (c), in conjunction with other evidence of liability under one or more of those subsections. Onyx makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, imported, or offered for sale in the past, without authority, or induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe claim 1 of the ’596 patent, including without limitation, the Accused Instrumentalities.

Unless otherwise noted, Sino Star believes and contends that each element of each claim asserted herein is literally met through Onyx’s provision of the Accused Instrumentalities. However, to the extent that Onyx attempts to allege that any asserted claim element is not literally met, Sino Star believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Instrumentalities, Sino Star did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Instrumentalities, as set forth herein. In each instance, the identified feature of the Accused Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Instrumentalities, Sino Star asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. Sino Star reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Onyx. Sino Star also reserves the right to amend this infringement analysis by citing other claims of the ’635 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. Sino Star further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the “Accused Instrumentalities” column of each chart.

Claim #	Accused Instrumentalities
<p>1. A method for controlling an electronic book, comprising steps of:</p>	<p>Upon information and belief, Onyx is the direct infringer practicing a method for controlling an electronic book by Onyx's BOOX Max Lumi.</p> <div data-bbox="793 423 1554 1000" data-label="Image"> </div> <p>ONYX BOOX MAX Lumi is a top-end e-reader with a huge 13.3-inch E Ink Mobius Carta screen with MoonLight 2 and protective glass. This model will be the ideal choice for those who have to read educational or technical literature, for musicians and programmers. A large and eye-friendly display, a powerful</p> <p>Source: https://onyxboox.com/boox_maxlumi</p>

controlling at least a display of said electronic book with an electronic book behavior specification,

The BOOX Max Lumi includes controlling at least a display of said electronic book with an electronic book behavior specification. For example, the BOOX Max Lumi includes a display and an electronic book behavior specification that supports file formats such as MOBI and EPUB.



Format Support

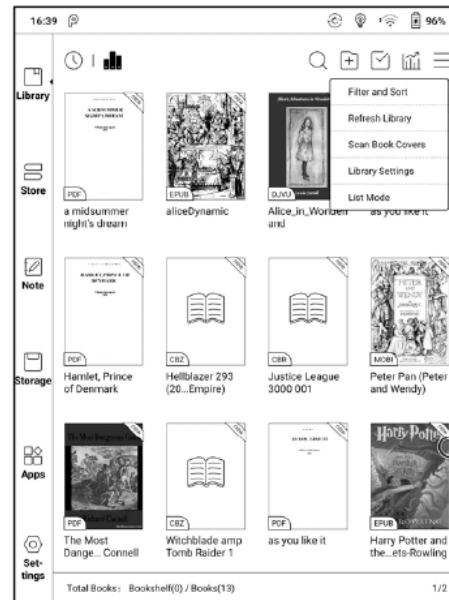
The BOOX software allows you to open many different text and image file formats. While reading, you can change the style and size of the font, the position of the pages, add bookmarks and arbitrarily scale documents.

Source: https://onyxboox.com/boox_maxlumi

Supported file
formats

TXT, HTML, RTF, FB2, FB2.zip, DOC, DOCX, PRC, MOBI, CHM, EPUB, JPG,

Source: https://onyxboox.com/boox_maxlumi



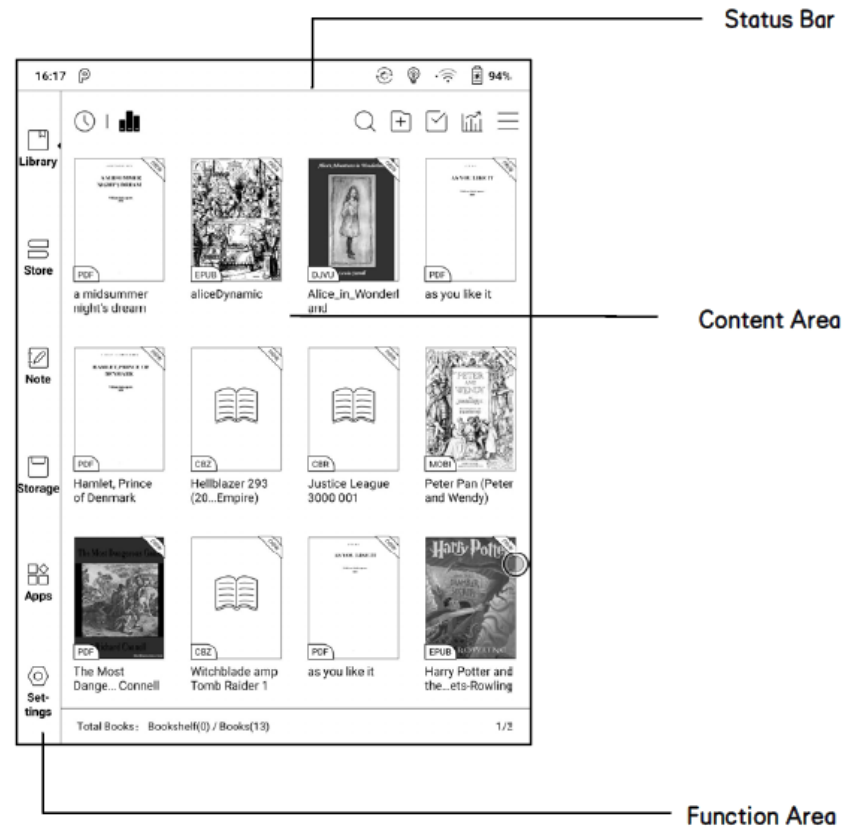
The library only displays E-book documents in supported formats in the storage. Book cover thumbnail is displayed by default. E-books are sorted by the creation time.

Source: https://onyxboox.com/files/manuals/BOOX_MaxLumi_User_Manual.pdf

<p>said electronic book behavior specification containing both a static specification</p>	<p>The BOOX Max Lumi electronic book behavior specification contains both a static specification and a dynamic specification. As an example of the static specification, when the Max Lumi displays e-book documents in supported formats, such as EPUB, the Max Lumi electronic book behavior specification contains book attributes (e.g. title, author, contents) from the EPUB document.</p> <table border="1" data-bbox="491 375 1883 488"> <tr> <td data-bbox="491 375 835 488"> <p>Book Formats</p> </td><td data-bbox="835 375 1883 488"> <p>PDF, EPUB , TXT, DJVU, HTML, FB2, DOC, MOBI, CHM, etc.</p> </td></tr> </table> <p>Source: https://onyxboox.com/files/manuals/BOOX_MaxLumi_User_Manual.pdf</p> <p>An EPUB Publication consists of one or more Renditions of its content, each of which is represented by what is called an EPUB Package. An EPUB Package consists of all the resources needed to render the content. The key file among these is the Package Document, which includes all the metadata used by Reading Systems to present the EPUB Publication to the user (e.g., the title and author for display in a bookshelf, as well rendering metadata such as whether content has a fixed layout or can be reflowed). It also provides a complete manifest of resources, and includes a spine that lists the sequence to render documents in as a user progresses through the content.</p> <p>Source: https://www.w3.org/publishing/epub32/epub-spec.html#sec-intro-epub-specs</p>	<p>Book Formats</p>	<p>PDF, EPUB , TXT, DJVU, HTML, FB2, DOC, MOBI, CHM, etc.</p>
<p>Book Formats</p>	<p>PDF, EPUB , TXT, DJVU, HTML, FB2, DOC, MOBI, CHM, etc.</p>		
<p>and a dynamic specification, said dynamic specification configured to allow an electronic book behavior to be initiated or modified via a</p>	<p>The BOOX Max Lumi electronic book behavior specification contains both a static specification and a dynamic specification, said dynamic specification configured to allow an electronic book behavior to be initiated or modified via a user-initiated command or an automatically-initiated command. As an example of the dynamic specification, the Max Lumi is configured to allow an electronic book behavior to be initiated or modified via a user-initiated command or an automatically-initiated command from the main interface of the Max Lumi and its function area.</p>		

user-initiated command or an automatically-initiated command,

The main interface contains a status bar, content area, and function area.
The function area contains certain modules.
Double-click icons in function area can return to the main page of the specific module.

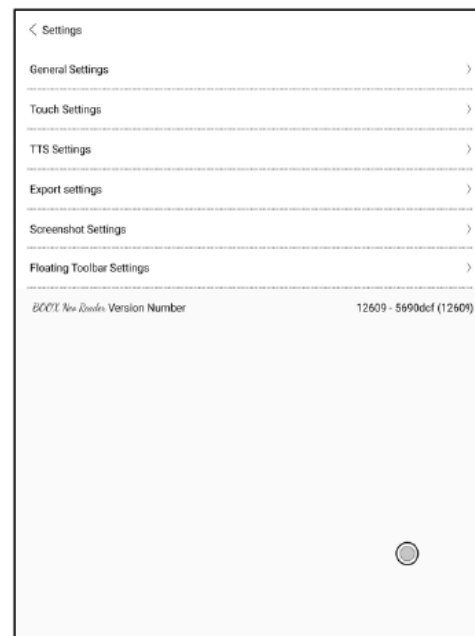


Source: https://onyxboox.com/files/manuals/BOOX_MaxLumi_User_Manual.pdf

wherein said step of controlling said electronic book with a dynamic specification comprises at least one of: controlling event triggered page flipping; controlling an electronic book auto-flipping; and controlling an electronic book auto-narration.

The BOOX Max Lumi includes said step of controlling said electronic book with a dynamic specification that comprises at least one of: controlling event triggered page flipping; controlling an electronic book auto-flipping; and controlling an electronic book auto-narration. For example, the Max Lumi includes Text To Speech (TTS) settings for controlling an e-book auto-narration.

There are General Settings, Touch Settings, TTS Settings, Export Settings, Screenshot Settings, Floating Toolbar Settings, and Version Name.



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